

# **EXHIBIT 3**

**FILED UNDER SEAL**

**From:** SESSIONS, Justina (JKS)  
**Sent:** Thursday, April 25, 2024 9:37 AM  
**To:** Zeke DeRose III; Marc B. Collier; Geraldine W. Young; BAYOUMI, Jeanette  
**Cc:** Paul Yetter; MCCALLUM, Robert; Bracewell, Mollie; MAHR, Eric (EJM); Moran, David; Nilsson, William (DAL); Mark Lanier; Ashley Keller; John McBride; Jonathan Wilkerson; Young, Trevor (TX); Peter M. Hillegas; James Lloyd; Thomas Ray; Alex J. Brown; SALEM, Sara; ELMER, Julie (JSE); SONG, Tinny; Marisa Madaras; Gabriel Culver  
**Subject:** RE: Google AdTech (EDTX): Categories and First Priority of States' 30(b)(6) to Google per Special Master Conference

Dear Zeke –

We are withdrawing [REDACTED] as a 30(b)(6) witness entirely. Mr. [REDACTED] is designated on Ms. [REDACTED] prior topics and the additional ones we noted. Mr. [REDACTED] will be prepared to testify regarding:

- Google's policies and procedures for public statements to customers about the Google Ad Tech Products referenced in the Fourth Amended Complaint and/or for customer notifications regarding product changes for those same products.
- Communications programs or strategies relating to RPO, DRS, Bernanke, and the Unified First Price auction, including the disclosures made (if any) and the manner in which each was disclosed
- Google's external statements or communications regarding the benefits or drawbacks of auction types.
- Current sell-side product strategies

These designations cover aspects of Topics 20, 37, 39, 40-47, 49, 50-52, 74, 78, 98, and 101(g), (h), (j), and (k).

I also have another update for you:

Mr. [REDACTED] is available to provide additional 30(b)(6) testimony on May 2 and May 3 from 9-12 ET each day.

Regards,  
Tina